

LAWRENCE R. BAILEY, JR.

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April 11, 2008

Hon. William H. Pauley, III
United States District Judge
500 Pearl Street
New York, NY 10007

Dear Judge Pauley:

Re: Lawrence R. Bailey, Jr. v. Target Corporation
Docket No.: 08 Civ. 1473 (WHP)

I am the Plaintiff Pro Se in the above-entitled matter. I am also an attorney admitted to practice before this Honorable Court and the Courts of the State of New York, inter alia.

This matter involves five checks, which the Plaintiff contends were created by the Defendant on the Plaintiff's checking account with out my knowledge or consent. The checks were written with a different person's name on the account, but with the Plaintiff's Account Number. The checks the Plaintiff has information were created by Defendant and made payable to the Defendant.

Defendant contends that any error, misrepresentation or fraud was committed by non-parties Juliet Bailey and/or JP Morgan Chase.

Plaintiff's time to serve a Complaint in supplement to the State Court Summons with Notice has been extended by stipulation to April 25, 2008.

Please consider this letter the discovery plan agreed upon by the parties:

Plaintiff's Discovery:

1. The Plaintiff will serve Interrogatories on the Defendant by May 9, 2008 seeking the name and address of the Target employee, who created the check, the circumstances of the creation of the check, the circumstances of the negotiation of the check, etc. Also, Plaintiff may serve a document discovery request seeking policies concerning the oral creation and negotiation of checks, etc.
2. Upon receiving full and complete responses, the Plaintiff will have the right to notice depositions of appropriate employees of the Defendant and possibly non-party JP Morgan/Chase .

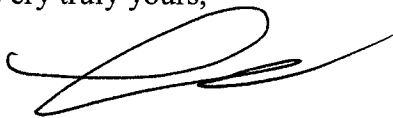
Hon. William H. Pauley, III
April 11, 2008
Page 2

Defendant's Discovery:

1. Defendant will serve Interrogatories by May 9, 2008 seeking particulars of Plaintiff's claim including basis for punitive damage claim.
2. Defendant will serve document discovery request by May 9, 2008.
3. Defendant will conduct deposition of Plaintiff after same.
4. Defendant wishes to conduct a non-party Deposition of Juliet R. Bailey and JP Morgan Chase.

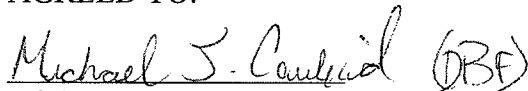
Defendant reserves the right to implead JP Morgan Chase and/or Juliet R. Bailey within thirty days after completion of depositions noted above.

Very truly yours,



Lawrence R. Bailey, Jr.

LRB/rb
AGREED TO:



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